

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,
Debtors.

)
) Chapter 11
)

) Case No. 23-00623 (TJC)
)

) (Jointly Administered)
)

) **Objections Due: November 27, 2023 at 4:00 p.m.**
) **Hearing Date: *Only if objections are filed***

**SECOND MONTHLY APPLICATION OF SILLS CUMMIS & GROSS P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
PERIOD FROM SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of Applicant:

Sills Cummis & Gross P.C.

Authorized to provide professional services to:

Official Committee of Unsecured Creditors

Date of Retention:

October 12, 2023 *effective as of* August 18, 2023

Period for which compensation
and reimbursement are sought:

September 1, 2023 – September 30, 2023

Amount of compensation sought as actual,
reasonable, and necessary:

\$151,167.00 (80% of \$188,958.75)

Amount of expense reimbursement sought
as actual, reasonable, and necessary:

\$3,613.37

This is a monthly application.

COMPENSATION BY PROFESSIONAL

Name of Professional Individual	Position, Department, Year of First Bar Admission	Hourly Billing Rate	Total Hours Billed	Total Compensation
Andrew Sherman	Member, Bankruptcy First Bar Admission: 1991	\$995	45.45	\$45,222.75
Boris Mankovetskiy	Member, Bankruptcy First Bar Admission: 2001	\$875	101.6	\$88,900.00
Jason Teele	Member, Bankruptcy First Bar Admission: 2001	\$850	65.7	\$55,845.00
Matthew Holden	Member, Corporate First Bar Admission: 2006	\$695	10.5	\$7,297.50
Michael Savetsky	Of Counsel, Bankruptcy First Bar Admission: 2005	\$795	39.6	\$31,482.00
Gregory A. Kopacz	Of Counsel, Bankruptcy First Bar Admission: 2010	\$725	15.4	\$11,165.00
Oleh Matviyishyn	Associate, Bankruptcy First Bar Admission: 2022	\$475	1.4	\$665.00
Anna L. Irvin	Library Director	\$325	0.6	\$195.00
Total Fees at Standard Rates			280.25	\$240,772.25
Total Fees at \$675 Blended Hourly Rate¹			280.25	\$188,958.75

¹ As noted in Sills' retention application [Docket No. 228] (the "Retention Application"), "Sills fees (not including expenses) will be limited to the lesser of (i) the amount of Sills' fees at its professionals' standard rates . . . and (ii) the amount of Sills' fees at a blended hourly rate of \$675." See Retention Application ¶ 16.

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Asset Analysis and Recovery (101)	1.8	\$1,575.00
Asset Disposition (102)	37.9	\$32,729.50
Case Administration (104)	44.2	\$39,841.50
Claims Administration and Objections (105)	23.4	\$18,630.00
Fee/Employment Applications (107)	13.2	\$9,840.00
Fee/Employment Objections (108)	15.0	\$12,892.50
Financing (109)	61.9	\$53,016.50
Litigation (Other than Avoidance Action Litigation) (110)	74.4	\$64,283.50
Relief from Stay Proceedings (114)	3.2	\$2,740.00
Travel (billed at 50%)	5.25	\$5,223.75
Total Fees at Standard Rate	280.25	\$240,772.25
Total Fees at \$625 Blended Rate¹	280.25	\$188,958.75

EXPENSE SUMMARY

Expense Category	Total Expenses
Pacer/Online Research	\$5.20
Lexis-Nexis	\$107.38
Court Reporter Transcript Fees	\$3,500.79
TOTAL	\$3,613.37

¹ Sills' attorneys' fees are subject to a blended hourly rate cap of \$675. See Retention Application ¶ 16.

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THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
PERIOD FROM SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Pursuant to Bankruptcy Code sections 330 and 331, Federal Rule of Bankruptcy Procedure 2016 (the “Bankruptcy Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 224] (the “Compensation Order”), Sills Cummis & Gross P.C. (“Sills”) files this *Second Application for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period From September 1, 2023 Through September 30, 2023* (the “Application”), seeking allowance of \$151,167.00 (80% of \$188,958.75) in fees, *plus* \$3,613.37 for reimbursement of actual and necessary expenses, for a total of \$154,780.37.

Background

1. On August 7, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.
2. On August 15, 2023, the U.S. Trustee formed the Committee [Docket. No. 107].
3. The Committee retained Sills as co-counsel pursuant to this Court’s *Order Granting Application to Retain and Employ Sills Cummis & Gross P.C. as Co-Counsel for the Official Committee*

of Unsecured Creditors, Effective as of August 18, 2022 [Docket No. 355].

Compensation Paid and Its Source

4. All services for which compensation is requested were performed for or on behalf of the Committee. During the compensation period, Sills received no payment and no promises for payment from any source other than the Debtors for services to be rendered in any capacity in connection with the matters covered by this Application. There is no agreement or understanding between Sills and any other person, other than with the members, of counsel and associates of the firm, for the sharing of compensation to be received in these cases.

Fee Statements

5. The fee statement for this period is attached as **Exhibit A**. To the best of Sills' knowledge, this Application reasonably complies with Bankruptcy Code sections 330 and 331, the Bankruptcy Rules, the *Guidelines for Reviewing Applications for Compensation and Reimbursement for Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective November 1, 2013*, and the Compensation Order.

Summary of Services by Project

A. Asset Analysis and Recovery

Fees: \$1,575.00; Total Hours: 1.8

This category includes time spent analyzing a Mercy Foundation audit and balance sheet.

B. Asset Disposition

Fees: \$32,729.50; Total Hours: 37.9

This category includes time spent: (a) reviewing, analyzing, revising and negotiating bidding procedure and sale documents; (b) drafting a bidding procedures objection; (c) analyzing bid documents and a proposed asset purchase agreement; (d) attending a deposition related to the sale process; and (e) communicating with Debtors' counsel, counsel to the stalking horse bidder,

the Committee's financial advisor, and the U.S. Trustee regarding the foregoing and related matters.

C. Case Administration

Fees: \$39,841.50; Total Hours: 44.2

This category includes time spent: (a) attending Committee meetings and preparing updates for the Committee members; (b) attending the 341 creditor meeting; (c) preparing for and attending hearings; (d) addressing matters related to the Debtors' "first day" motions and related orders and other matters related to the administrative of the Debtors' chapter 11 cases; (e) addressing Foundation matters and conducting related research and analysis; (f) responding to creditor queries and addressing pending matters; and (g) communicating with the Committee members, Debtors' counsel, bondholders' counsel, the Mercy Foundation and others regarding the foregoing and related matters.

D. Claims Administration and Objections

Fees: \$18,630.00; Total Hours: 23.4

This category includes time spent: (a) analyzing pensioner claims, reviewing pension documents, conducting related research, and drafting a related memorandum; (b) reviewing and analyzing the bar date order; (c) analyzing alleged liens and security interests asserted against the Debtors' assets; and (d) communicating with the Committee regarding the foregoing and related matters.

E. Fee/Employment Applications

Fees: \$9,840.00; Total Hours: 13.2

This category includes time spent: (a) preparing Sills' retention application and conducting related research and analysis; and (b) assisting in the preparation of the Committee's financial advisor's retention application.

F. Fee/Employment Objections

Fees: \$12,892.50;

Total Hours: 15.0

This category includes time spent: (a) drafting an objection to Toneykorf's retention application and conducting related research, analysis and negotiations; (b) addressing matters related to the proposed retention of MWE, including analyzing MWE's supplemental declaration and drafting a statement regarding MWE's proposed retention; (c) reviewing and analyzing H2C's retention application; (d) reviewing and analyzing objections filed by third parties to the Debtors' professionals' retentions applications, reviewing and analyzing the Debtors' omnibus reply in support of such retention applications, and addressing matters related to potential resolutions of such objections; and (e) communicating with the Committee members and counsel to ToneyKorf regarding the foregoing and related matters.

G. Financing

Fees: \$53,016.50;

Total Hours: 61.9

This category includes time spent: (a) drafting a cash collateral objection and cross-motion for an order to show cause and conducting related research, analysis and negotiations; (b) addressing matters related to the potential use of the Mercy Foundation's funds and conducting related research and analysis; (c) addressing related discovery and confidentiality matters, including drafting a joint status conference request, and attending a related deposition; (d) drafting and negotiating settlement term sheets and a motion to approve such settlement and conducting related research and analysis; and (e) communicating with Debtors' counsel, the Committee members, the Committee's other advisors, the Master Trustee and Preston Hollow regarding the foregoing and related matters.

H. Litigation (Other than Avoidance Action Litigation)

Fees: \$64,283.50;

Total Hours: 74.4

This category includes time spent: (a) drafting an objection to a motion to appoint an examiner and conducting related analysis; (b) reviewing and analyzing the Debtors' and the Foundation's discovery productions and addressing related matters; (c) addressing confidentiality and scheduling matters; (d) drafting, analyzing, revising and negotiating proposed settlement term sheets regarding Mercy Foundation disputes; (e) preparing for and attending a related deposition; and (f) communicating with Debtors' counsel, Preston Hollow and others regarding the foregoing and related matters.

I. Relief from Stay Proceedings

Fees: \$2,740.00; Total Hours: 3.2

This category includes time spent: (a) conducting research and analysis regarding potential violations of the automatic stay; and (b) communicating with the Committee and Debtors' counsel regarding related matters.

J. Travel (billed at 50%)

Fees: \$5,223.75; Total Hours: 5.25

This category includes time spent traveling to and from Cedar Rapids.

Conclusion

6. Sills submits the amounts sought are fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

WHEREFORE, Sills requests an allowance be made to Sills for the sums \$151,167.00 (80% of \$188,958.75) as compensation, *plus* \$3,613.37 for reimbursement of actual and necessary expenses, for a total of \$154,780.37, and that such amount be authorized for payment.

Dated: November 9, 2023

Respectfully submitted,

/s/ Andrew H. Sherman

Andrew H. Sherman, NJS Bar No. 042731991
(admitted *pro hac vice*)
Boris I. Mankovetskiy, NJS Bar No. 012862001
(admitted *pro hac vice*)
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*Attorneys for The Official Committee of Unsecured
Creditors of Mercy Hospital, Iowa City, Iowa, et al.*

Certificate of Service

The undersigned certifies, under penalty of perjury, that on November 9, 2023, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case

/s/ Stephanie Newton

Sills Cummis & Gross

A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, NJ 07102-5400
(973) 643-7000

Official Unsecured Creditors Committee of Mercy Hospital
c/o Steindler Orthopedic Clinic, Committee Chair
Attn: Edward Patrick Magallanes, President and CEO
222 W. Merchandise Mart Plaza #2024
2751 Northgate Drive
Iowa City, IA 52245

October 31, 2023
Client/Matter No. 08650147.000001
Invoice: 2048444
Billing Attorney: AHS
Federal Tax Id: 22-1920331

RE: Creditors' Committee

For Legal Services Rendered Through September 30, 2023

				HOURS	AMOUNT
101 – ASSET ANALYSIS AND RECOVERY					
09/28/23	BM	101	Analysis of issues regarding Foundation audit.	0.60	
09/28/23	BM	101	Analysis regarding Debtors' JV interests.	0.80	
09/29/23	BM	101	Analysis regarding Foundation's balance sheet.	0.40	
TASK TOTAL 101				1.80	\$1,575.00
102 – ASSET DISPOSITION					
09/01/23	BM	102	Analysis regarding response to bidding procedures and sale motion.	1.10	
09/01/23	JT	102	Review sale documents.	0.70	
09/01/23	GAK	102	Analysis of prior offer to purchase hospital.	0.20	
09/04/23	BM	102	Analysis regarding revisions of proposed bidding procedures.	0.90	
09/04/23	JT	102	E-mail from N. Ganti regarding bid procedures.	0.30	
09/04/23	JT	102	Review and revise markup of bid procedures.	0.60	

Creditors' Committee

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				HOURS	AMOUNT
09/06/23	BM	102	Analysis regarding proposed bidding procedures.	1.10	
09/06/23	BM	102	Analysis regarding stalking horse APA.	1.20	
09/06/23	BM	102	Analysis regarding limited objection to proposed bidding procedures and UI APA.	1.30	
09/06/23	BM	102	Comment on Debtors' proposed revised bidding procedures.	0.70	
09/06/23	JT	102	Review and revise comments to stalking horse APA.	0.70	
09/06/23	JT	102	Review updated bid procedures.	0.50	
09/06/23	MS	102	Confer with J. Teele re: bid procedures objection.	0.20	
09/06/23	MS	102	Confer with B. Mankovetskiy re: bid procedures objection.	0.10	
09/06/23	MS	102	Call with B. Mankovetskiy re: bid procedures objection.	0.10	
09/06/23	MS	102	Review bidding procedures motion.	1.20	
09/06/23	MS	102	Review Committee comments to proposed bidding procedures and Debtors' revised proposed bidding procedures.	0.50	
09/06/23	MS	102	Draft further revisions to proposed bidding procedures.	0.30	
09/06/23	MS	102	Draft limited objection to bidding procedures motion.	2.10	
09/07/23	BM	102	Analysis regarding potential resolution of bidding procedures objections.	0.80	
09/07/23	BM	102	Correspondence with Debtors' counsel regarding sale issues.	0.40	
09/07/23	BM	102	Analysis regarding objection to bidding procedures and stalking horse APA.	1.10	

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				HOURS	AMOUNT
09/07/23	BM	102	Analysis and revisions of proposed bidding procedures.	1.20	
09/07/23	BM	102	Call with UI's counsel regarding bidding procedures and stalking horse APA.	0.40	
09/07/23	BM	102	Call with Debtors' counsel regarding bidding procedures.	0.30	
09/07/23	AHS	102	Negotiate bid protection issues with counsel for purchaser and counsel for debtors.	0.40	
09/07/23	AHS	102	Attend deposition of C.R. Bayman, H2C representative.	3.80	
09/07/23	JT	102	Attend R. Bayman deposition.	4.20	
09/07/23	JT	102	Review further revised bid procedures.	0.50	
09/07/23	JT	102	E-mail from J. Knapp regarding bid procedures.	0.30	
09/07/23	MS	102	Review and further revise draft bidding procedures order re: settlement discussions, draft further revisions to same.	0.60	
09/07/23	MS	102	Conduct legal research re: limited objection to bidding procedures motion.	0.80	
09/07/23	MS	102	Draft limited objection to bidding procedures motion.	2.10	
09/07/23	MS	102	Revise markup of proposed revised bidding procedures.	0.40	
09/07/23	MS	102	Call with B. Mankovetskiy re: markup of proposed revised bidding procedures.	0.20	
09/08/23	BM	102	Analysis regarding revised bidding procedures.	0.90	
09/08/23	BM	102	Analysis and revisions of proposed form of order approving bid procedures and stalking horse APA.	0.70	
09/08/23	BM	102	Analysis regarding sale process.	0.30	

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				HOURS	AMOUNT
09/08/23	AHS	102	Call with UST re: bidding procedures, sale issues and objections to retention applications.	0.30	
09/08/23	JT	102	E-mail from N. Ganti regarding sale process.	0.30	
09/08/23	JT	102	E-mail from A. Sherman regarding bid procedures.	0.20	
09/11/23	MS	102	Review proposed bidding procedures order and bidding procedures as filed with the Court.	0.40	
09/13/23	MS	102	Review revised proposed bidding procedures order.	0.20	
09/15/23	BM	102	Analysis of issues regarding sale process.	0.80	
09/20/23	GAK	102	Analysis of Bidding Procedures and related matters.	0.40	
09/21/23	JT	102	E-mail from N. Ganti regarding sale process.	0.30	
09/21/23	MS	102	Review sale process updates from N. Ganti.	0.20	
09/28/23	BM	102	Analysis regarding sale process issues.	0.90	
09/29/23	AHS	102	Call re: potential credit bid by Preston Hollow and diligence regarding enforceability of security interests.	0.70	
TASK TOTAL 102				37.90	\$32,729.50

104 – CASE ADMINISTRATION

09/01/23	JT	104	E-mail to Debtor's counsel regarding schedule of hearings and objection deadlines.	0.30	
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				HOURS	AMOUNT
09/01/23	MS	104	Call with D. Simon, F. Perlman, N. Coco, K. Walsh, A. Sherman and J. Teele re: negotiations on bid procedures, retention issues, cash collateral, and scheduling of various pending motions.	0.60	
09/04/23	AHS	104	Review of updated notice of appointment and emails re: same.	0.20	
09/04/23	JT	104	Telephone conference with Lender's counsel regarding pending motions.	0.60	
09/05/23	BM	104	Attend to issues regarding continuance of the pending hearings.	0.40	
09/05/23	JT	104	Review Foundation 990.	0.40	
09/05/23	JT	104	Research regarding Mercy Foundation.	0.90	
09/05/23	MS	104	Draft e-mail to Committee re: limited objection to ToneyKorf retention application and objection to final cash collateral order.	0.10	
09/06/23	BM	104	Call with Preston Hollow's counsel regarding pending matters.	0.80	
09/06/23	BM	104	Attend Committee meeting.	0.70	
09/06/23	AHS	104	Attend creditor's committee meeting.	1.00	
09/06/23	AHS	104	Listen to certain portions of 341 meeting and follow up with questions to be asked.	0.60	
09/06/23	JT	104	Attend 341 Meeting.	1.20	
09/06/23	JT	104	Attend telephonic committee meeting.	0.40	

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				HOURS	AMOUNT
09/06/23	GAK	104	Review notification adjourning hearing on examiner motion and emails to team regarding same	0.20	
09/07/23	BM	104	Prepare an update for Committee.	0.50	
09/07/23	AHS	104	Email to Committee re: bidding, foundation, cash collateral.	0.30	
09/07/23	MS	104	Draft e-mail to Committee re: update on negotiations on bidding procedures motion and statement in response to McDermott retention application.	0.40	
09/08/23	BM	104	Call with bondholders' counsel regarding pending matters.	0.50	
09/08/23	AHS	104	Revise and finalize objections to ToneyKorf retention and cash collateral/objection cross motion, emails with Iowa counsel, review of comments and have pleadings filed.	0.60	
09/08/23	AHS	104	Emails with counsel for Foundation re: discovery issues, call with counsel for Preston Hollow re: discovery and foundation issues, follow up emails re: discovery and foundation issues.	0.60	
09/11/23	BM	104	Analysis regarding proposed orders regarding employee wages and benefits, utilities, and compensation procedures.	0.80	
09/11/23	JT	104	Review docket for Thursday's hearing.	0.30	
09/11/23	GAK	104	Preparations for September 13 hearing.	0.20	

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				HOURS	AMOUNT
09/11/23	MS	104	Review revised proposed utilities, wages and interim compensation orders and order continuing hearing on cash collateral.	0.30	
09/12/23	BM	104	Call with Debtors' counsel regarding pending matters.	0.50	
09/12/23	BM	104	Call with bondholders representative regarding pending matters.	0.40	
09/12/23	AHS	104	Review of pleadings in advance of hearing and prepare for hearing.	0.60	
09/13/23	BM	104	Analysis regarding potential settlement of funding issues with Foundation, Debtors and Preston Hollow.	0.90	
09/13/23	BM	104	Analysis regarding post-hearing proposed forms of final orders on first day motions and resolved professional employment applications.	0.70	
09/13/23	BM	104	Analysis of ombudsman's report.	0.30	
09/13/23	BM	104	Call with Preston Hollow's counsel regarding pending matters.	0.40	
09/13/23	AHS	104	Attend meetings with Debtors' counsel, counsel for bondholders and counsel for foundation re: funding issues, examiner, cash collateral.	3.50	
09/13/23	AHS	104	Calls with counsel for bondholders re: potential settlement of foundation issues.	0.30	
09/13/23	AHS	104	Follow up with parties (including creditors) after hearing.	0.40	

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				HOURS	AMOUNT
09/13/23	AHS	104	Prepare for and attend hearing re: retention issues, bidding procedures and status.	1.80	
09/14/23	BM	104	Prepare an update for Committee.	0.60	
09/15/23	BM	104	Call with Debtors' and Foundation's counsel regarding pending matters.	0.70	
09/15/23	BM	104	Call with counsel to Preston Hollow, Foundation and Debtors regarding potential global settlement.	0.40	
09/15/23	BM	104	Prepare an update for Committee.	0.70	
09/15/23	AHS	104	Telephonic court appearance re: cash collateral and scheduling issues.	0.60	
09/15/23	JT	104	E-mail from N. Coco regarding term sheet.	0.20	
09/18/23	BM	104	Call with bondholder representative's counsel regarding pending matters.	0.40	
09/18/23	JT	104	Telephone conference with Lender's counsel regarding foundation issues.	0.50	
09/19/23	JT	104	Research regarding foundation issues.	1.20	
09/19/23	GAK	104	Call and emails with O. Matviyishyn regarding work flow, next steps, upcoming hearings/deadlines.	0.20	
09/19/23	OM	104	Review docket, update critical dates calendar and circulate same to team with reminders.	1.20	
09/20/23	BM	104	Prepare an update for Committee.	0.60	

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				HOURS	AMOUNT
09/20/23	AHS	104	Prepare for and attend telephonic hearing re: ToneyKorf retention and scheduling issues.	1.10	
09/20/23	AHS	104	Prepare for and attend hearing ToneyKorf retention issues and review of form of order.	0.70	
09/21/23	BM	104	Call with Debtors' counsel regarding pending matters.	0.50	
09/21/23	BM	104	Prepare update for Committee.	0.60	
09/22/23	MH	104	Email to A. Sherman re: revised By-Laws Article I Section 3(b) and Article IV.	0.50	
09/22/23	AHS	104	Review and revise letter to counsel for Debtors re: foundation's attempt to amend by-laws.	0.80	
09/22/23	AHS	104	Various calls with counsel for Preston Hollow and counsel for Debtors re: foundation's attempt to amend by-laws.	1.10	
09/22/23	AHS	104	Review of foundation amended by-laws, original by-laws and research into whether amendment is effective.	1.20	
09/22/23	JT	104	Review Foundation by-laws and amended by-laws.	0.80	
09/22/23	JT	104	Telephone conference with A. Sherman and B. Mankovetskiy regarding Foundation by-laws.	0.30	
09/23/23	AHS	104	Call with Debtors' counsel re: foundation issues and review of letter from M. Toney to Foundation.	0.70	
09/24/23	BM	104	Call with Debtors' counsel regarding pending matters.	0.40	
09/25/23	AHS	104	Email to Committee re: foundation issues and case status.	0.30	

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				HOURS	AMOUNT
09/26/23	BM	104	Call with bondholders' counsel regarding pending matters.	0.70	
09/27/23	BM	104	Call with Debtors' and bondholders' counsel regarding pending matters.	0.70	
09/28/23	BM	104	Prepare an update for Committee.	0.60	
09/28/23	BM	104	Respond to creditors' inquiries regarding case status.	0.40	
09/28/23	AHS	104	Emails to committee re: sale process, foundation issues and term sheet.	0.70	
09/28/23	AHS	104	Review and revise term sheet re: foundation issues.	0.80	
09/28/23	OM	104	Review docket, update critical dates calendar and circulate same to team with reminders.	0.20	
09/29/23	BM	104	Call with Debtors' counsel regarding pending matters.	0.70	
09/29/23	AHS	104	Review of drafts of term sheet.	0.40	
TASK TOTAL 104				44.20	\$39,841.50

105 – CLAIMS ADMINISTRATION AND OBJECTIONS

09/04/23	JT	105	E-mail from A. Sherman regarding Pension issues.	0.20	
09/12/23	BM	105	Analysis regarding pensioners' claims and pension plan status.	0.90	
09/21/23	MS	105	Confer with B. Mankovetskiy re: email to Committee re: bar date.	0.10	
09/21/23	MS	105	Review docket re: bar date order and review Epiq website instructions and proof of claim form for Committee update.	0.30	
09/21/23	MS	105	Draft e-mail to Committee re: bar date for proofs of claim and instructions re: same.	0.40	

Creditors' Committee

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				HOURS	AMOUNT
09/25/23	BM	105	Analysis of pension plan documents and potential claims.	1.60	
09/26/23	MH	105	Call from J. Teele, Esq. re: pension and liabilities.	0.30	
09/26/23	MH	105	Review Pension Plan documents.	2.00	
09/26/23	MH	105	Begin drafting email memo to regarding Pension Plan documents.	1.90	
09/26/23	BM	105	Analysis regarding pension plan issues.	1.20	
09/26/23	AHS	105	Review of pension plan documents and initial research into whether there are claims arising from pension plan.	1.20	
09/26/23	JT	105	Research regarding Pension claim issues.	0.90	
09/26/23	JT	105	Telephone conference with M. Holden regarding Pension.	0.30	
09/26/23	JT	105	Review Pension documents.	2.10	
09/27/23	MH	105	Continue drafting email memo regarding Pension Plan documents.	5.80	
09/27/23	BM	105	Analysis regarding pension plan issues and attendant liabilities.	0.80	
09/27/23	JT	105	Review internal memo regarding Pension claims.	0.60	
09/27/23	JT	105	Additional research regarding Pension issues.	0.90	
09/29/23	BM	105	Analysis regarding investigation of Bond Trustee's liens and security interests.	1.90	
TASK TOTAL 105				<u>23.40</u>	<u>\$18,630.00</u>

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				HOURS	AMOUNT
107 – FEE/EMPLOYMENT APPLICATIONS					
09/07/23	GAK	107	Draft Committee Chair declaration in support of retention.	0.70	
09/07/23	GAK	107	Review local rules in connection with retention application.	0.20	
09/07/23	GAK	107	Draft proposed order for retention application.	0.60	
09/07/23	GAK	107	Begin drafting Sherman declaration in support of retention.	1.30	
09/07/23	GAK	107	Begin drafting Sills' retention application.	1.80	
09/08/23	GAK	107	Analysis of conflict search results and update Sherman Declaration accordingly.	3.30	
09/08/23	GAK	107	Draft retention memorandum.	0.70	
09/09/23	GAK	107	Finalize retention application materials for review by A. Sherman.	1.40	
09/10/23	AHS	107	Review and revise retention application.	0.60	
09/11/23	AHS	107	Further review of retention pleadings and firm memo responses.	0.40	
09/11/23	GAK	107	Update retention application to address comments of A. Sherman/B. Hempstead.	0.10	
09/11/23	GAK	107	Draft email to A. Sherman regarding retention memorandum.	0.10	
09/11/23	GAK	107	Draft email to R. Epstein regarding retention memorandum and next steps.	0.20	
09/11/23	GAK	107	Draft email to B. Mankovetskiy regarding retention application.	0.20	

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				HOURS	AMOUNT
09/11/23	GAK	107	Prepare firm wide email to be circulated regarding retention application and parties in interest.	0.20	
09/11/23	GAK	107	Update retention application to incorporate comments of B. Mankovetskiy.	0.10	
09/11/23	GAK	107	Analysis of conflict results.	0.30	
09/11/23	GAK	107	Review and analyze FTI's retention application.	0.90	
09/11/23	GAK	107	Draft email to FTI regarding comments to retention application.	0.10	
TASK TOTAL 107				13.20	\$9,840.00

108 – FEE/EMPLOYMENT OBJECTIONS

09/05/23	BM	108	Analysis regarding objection to ToneyKorf retention application.	0.70	
09/05/23	AHS	108	Review and revise ToneyKorf objection and circulate same for review.	0.30	
09/05/23	JT	108	E-mail from A. Sherman regarding Debtors' retention applications.	0.30	
09/05/23	JT	108	Review and revise objection to Toneykorf retention.	0.40	
09/05/23	GAK	108	Review draft retention objection and communications with J. Teele and M. Savetsky regarding same.	0.10	
09/05/23	MS	108	Review ToneyKorf retention application and engagement letter.	0.70	
09/05/23	MS	108	Draft and revise limited objection to ToneyKorf retention application.	1.40	

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				HOURS	AMOUNT
09/06/23	BM	108	Analysis regarding MWE retention issues and supplemental declaration.	0.80	
09/06/23	BM	108	Analysis regarding H2C's employment application.	0.70	
09/06/23	MS	108	E-mails with A. Sherman re: statement in response to McDermott retention application.	0.10	
09/06/23	MS	108	Review draft supplemental McDermott retention declaration.	0.10	
09/06/23	MS	108	E-mails with B. Mankovetskiy re: statement in response to McDermott retention application.	0.10	
09/06/23	MS	108	Draft statement in response to McDermott retention application.	0.60	
09/06/23	MS	108	Call with B. Mankovetskiy re: statement in response to McDermott retention application.	0.10	
09/06/23	MS	108	Review U.S. Trustee's objections to the Debtors' applications to retain McDermott, ToneyKorf and H2C Securities.	0.40	
09/07/23	BM	108	Analysis regarding objection to ToneyKorf retention application.	0.80	
09/07/23	BM	108	Analysis regarding resolution of concerns regarding MWE retention application and additional disclosures.	0.70	
09/07/23	MS	108	Revise statement in response to McDermott retention application.	0.10	

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				HOURS	AMOUNT
09/07/23	MS	108	E-mails with A. Sherman re: statement in response to McDermott retention application.	0.10	
09/08/23	BM	108	Analysis and revisions of limited objection to ToneyKorf retention and statement regarding MWE retention.	0.70	
09/08/23	AHS	108	Emails with committee member re: retention issues and respond to same.	0.40	
09/08/23	GAK	108	Analysis of UST objection to MWE retention.	0.20	
09/08/23	GAK	108	Review bondholder representative's objection to MWE Retention.	0.20	
09/11/23	BM	108	Analysis regarding potential resolution of objection to ToneyKorf retention.	0.60	
09/12/23	BM	108	Analysis regarding potential resolution of objection to ToneyKorf retention application.	0.40	
09/13/23	BM	108	Analysis regarding potential resolution of objection to ToneyKorf retention and supplemental disclosures.	0.80	
09/13/23	BM	108	Analysis regarding Debtors' omnibus reply in support of applications to retain professionals.	0.60	
09/15/23	BM	108	Analysis regarding proposed form of order approving H2C retention.	0.20	
09/18/23	BM	108	Analysis regarding proposed revised order approving ToneyKorf retention.	0.60	
09/18/23	AHS	108	Review of revised ToneyKorf order and analysis re: same.	0.30	

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				HOURS	AMOUNT
09/19/23	BM	108	Analysis and revisions of proposed form of order regarding ToneyKorf retention.	0.60	
09/19/23	BM	108	Correspondence with ToneyKorf's counsel regarding resolution of Committee's objections to retention of ToneyKorf .	0.60	
09/20/23	AHS	108	Call with counsel to ToneyKorf re: retention issues and email follow up re: same.	0.30	
TASK TOTAL 108				15.00	\$12,892.50

109 – FINANCING

09/01/23	BM	109	Analysis regarding response to cash collateral motion.	1.20	
09/01/23	JT	109	Telephone conference with Debtor's counsel regarding cash collateral issues.	0.50	
09/01/23	JT	109	Revise and review cash collateral objection.	0.90	
09/01/23	JT	109	Review cash collateral motion and order.	0.60	
09/01/23	GAK	109	Review revised cash collateral objection.	0.30	
09/01/23	GAK	109	Communications with Sills Team and FTI regarding cash collateral objection and cash burn.	0.10	
09/01/23	MS	109	Review and revise objection to final cash collateral order and cross-motion for an order to show cause.	4.20	
09/01/23	MS	109	Call with A. Sherman re: revisions to objection to final cash collateral order.	0.20	

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				HOURS	AMOUNT
09/05/23	BM	109	Analysis regarding objection to cash collateral order and cross-motion for order to show cause.	1.20	
09/05/23	AHS	109	Review and revise cash collateral objection/cross motion and circulate to the Committee for review and comment.	0.80	
09/05/23	JT	109	Conference with A. Sherman and M. Savetsky regarding cash collateral and discovery.	0.50	
09/05/23	JT	109	E-mail to M. Savetsky regarding cash collateral objection.	0.30	
09/05/23	MS	109	Review revisions to objection to final cash collateral order.	0.20	
09/05/23	MS	109	Review Mercy Hospital Form 990 for 2021.	0.30	
09/05/23	MS	109	Review and revise objection to final cash collateral order.	1.10	
09/05/23	MS	109	Confer with S. Teele re: cash collateral objection and foundation issues.	0.30	
09/06/23	BM	109	Analysis and revisions of Committee's objection to final cash collateral order.	0.80	
09/06/23	JT	109	Telephone conference with Debtor's counsel regarding cash collateral and other pending motions.	0.40	
09/06/23	JT	109	Telephone conference with Lender's counsel regarding discovery and cash collateral.	0.50	
09/06/23	MS	109	Further revise objection to final cash collateral order.	0.10	
09/06/23	MS	109	E-mails with A. Sherman and B. Mankovetskiy re: revisions to cash collateral objection.	0.40	

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				HOURS	AMOUNT
09/06/23	MS	109	Further review of Form 990s filed by the Foundation for cash collateral objection.	0.60	
09/06/23	MS	109	E-mails with A. Irvin re: Form 990s filed by the Foundation for cash collateral objection.	0.10	
09/06/23	MS	109	Confer with B. Mankovetskiy re: revisions to cash collateral objection.	0.10	
09/06/23	ALI	109	Obtain returns of certain tax-exempt organizations.	0.60	
09/07/23	MS	109	Further revise objection to final cash collateral order re: confidentiality.	0.20	
09/08/23	MS	109	Review stipulated protective order re: information in objection to final cash collateral order.	0.40	
09/08/23	MS	109	Review e-mails from A. Sherman re: confidentiality dispute re: information in objection to final cash collateral order.	0.10	
09/08/23	MS	109	Call with A. Sherman, B. Mankovetskiy, K. Walsh, and N. Coco re: discovery issues in connection with foundation issues.	0.40	
09/08/23	MS	109	Draft joint status conference request re: document production from the Foundation.	1.80	
09/11/23	JT	109	Conference with A. Sherman regarding cash collateral and discovery.	0.40	
09/13/23	GAK	109	Emails with M. Savetsky regarding cash collateral hearing and email to A. Sherman regarding same.	0.10	

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				HOURS	AMOUNT
09/13/23	MS	109	Draft term sheet for settlement with Mercy Hospital Foundation to resolve cash collateral objection and cross-motion.	1.80	
09/13/23	MS	109	Confer with B. Mankovetskiy re: term sheet for settlement with Mercy Hospital Foundation to resolve cash collateral objection and cross-motion.	0.30	
09/14/23	BM	109	Analysis regarding potential settlement of objections to final cash collateral order.	1.10	
09/14/23	BM	109	Attend deposition of Foundation witness.	2.90	
09/14/23	AHS	109	Emails with Committee re: foundation term sheet and call with committee chair re: same.	0.60	
09/14/23	AHS	109	Emails with counsel for foundation re: term sheet issues.	0.40	
09/14/23	AHS	109	Calls with counsel for Debtors' and bond trustee re: term sheet issues.	0.40	
09/14/23	AHS	109	Review and revise term sheet re: foundation and circulate to parties for review and comments.	0.80	
09/14/23	JT	109	Attend L. Steigleder deposition.	6.80	
09/14/23	MS	109	Draft motion to approve settlement with Mercy Hospital Foundation, the Debtors, Master Trustee and Preston Hollow.	5.80	

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				HOURS	AMOUNT
09/14/23	MS	109	Conduct legal research re: motion to approve settlement with Mercy Hospital Foundation, the Debtors, Master Trustee and Preston Hollow.	1.30	
09/15/23	AHS	109	Review of term sheet as circulated by Debtors and calls re: same.	0.40	
09/15/23	AHS	109	Emails with committee and committee members re: foundation funding and term sheet issues.	0.40	
09/15/23	AHS	109	Review and revise term sheet re: foundation funding and circulate to parties for review and consideration.	0.80	
09/15/23	AHS	109	Calls with counsel for Debtors re: foundation funding, term sheet and negotiation of term sheet. Calls with counsel for Preston Hollow re: foundation funding, term sheet and negotiation of term sheet.	1.30	
09/15/23	JT	109	Review cash collateral term sheet.	0.50	
09/18/23	AHS	109	Attend call with counsel for Debtors and Preston Hollow re: term sheet and foundation issues.	0.50	
09/18/23	AHS	109	Review and analysis of term sheet as modified by PH.	0.60	
09/18/23	AHS	109	Call with counsel for Preston Hollow re: foundation and term sheet issues.	0.50	
09/18/23	MS	109	Continue drafting motion to approve settlement with Mercy Hospital Foundation, the Debtors, Master Trustee and Preston Hollow.	2.60	

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				HOURS	AMOUNT
09/18/23	MS	109	Review and revise motion to approve settlement with Mercy Hospital Foundation, the Debtors, Master Trustee and Preston Hollow.	1.10	
09/19/23	BM	109	Call with Debtors' and Preston Hollow's counsel regarding potential settlement of cash collateral objections.	0.40	
09/19/23	AHS	109	Call with counsel for Debtors re: foundation and term sheet issues.	0.30	
09/19/23	JT	109	Review cash collateral term sheet.	0.30	
09/19/23	JT	109	Conference with A. Sherman regarding cash collateral.	0.40	
09/20/23	AHS	109	Review of foundation adversary proceeding and call to counsel for Debtors re: same.	0.40	
09/20/23	JT	109	Analyze cash collateral term sheet.	0.30	
09/21/23	BM	109	Analysis regarding supplemental objection to final cash collateral order.	0.70	
09/21/23	JT	109	Conference with B. Mankovetskiy regarding cash collateral.	0.30	
09/22/23	JT	109	Telephone conference with counsel for Debtors' and Lender regarding cash collateral.	0.50	
09/24/23	BM	109	Analysis regarding proposed revised final cash collateral order.	0.80	
09/26/23	BM	109	Analysis regarding final cash collateral order.	1.10	

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				HOURS	AMOUNT
09/26/23	AHS	109	Emails with committee members re: foundation issues and call to FTI to respond to same.	0.40	
09/26/23	AHS	109	Call with counsel for bondholders re: cash collateral, foundation and sale issues.	0.50	
09/26/23	JT	109	Telephone conference with Lender's counsel regarding cash collateral.	0.60	
09/27/23	AHS	109	Calls with counsel for Debtors and Preston Hollow re: foundation issues and funding issues.	0.70	
09/27/23	AHS	109	Email to committee re: foundation update and initial review of term sheet.	0.40	
09/27/23	AHS	109	Calls re: foundation audit/reconciliation issues.	0.60	
09/28/23	BM	109	Analysis regarding final cash collateral order.	1.10	
09/28/23	AHS	109	Calls with Debtors' counsel and counsel for Preston Hollow re: foundation audit/reconciliation, foundation term sheet.	0.70	
09/29/23	AHS	109	Calls with counsel for Debtors and counsel for Preston Hollow re: foundation term sheet and proposed changes.	0.80	
TASK TOTAL 109				61.90	\$53,016.50

110 – LITIGATION (OTHER THAN AVOIDANCE ACTION LITIGATION)

09/01/23	BM	110	Analysis of Debtors' productions in connection with Preston Hollow's discovery.	1.30	
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				HOURS	AMOUNT
09/01/23	BM	110	Analysis regarding response to motion to appoint examiner.	0.90	
09/01/23	JT	110	Revise and review Objection to Examiner Motion.	0.40	
09/04/23	BM	110	Analysis regarding Debtors' productions in connection with cash collateral, examiner and sale motions.	1.70	
09/04/23	AHS	110	Emails re: upcoming discovery and deposition scheduling.	0.20	
09/04/23	JT	110	E-mail from Lender's counsel regarding depositions.	0.20	
09/05/23	BM	110	Analysis regarding Debtors' discovery productions.	0.90	
09/05/23	JT	110	Review documents produced by Debtors.	3.40	
09/05/23	MS	110	Review Preston Hollow's motion to appoint an examiner.	0.60	
09/06/23	BM	110	Analysis of Debtors' document productions.	0.80	
09/07/23	BM	110	Analysis regarding objections to confidential designations of productions by Debtors and Foundation.	0.60	
09/07/23	BM	110	Analysis regarding Debtors' document productions.	1.20	
09/07/23	AHS	110	Address foundation discovery issues, protective order and meet and confer re: confidential document designation.	0.40	
09/07/23	JT	110	Continue reviewing Debtors' document production.	3.40	
09/07/23	JT	110	E-mail to D. Simon regarding depositions.	0.30	
09/07/23	JT	110	E-mail from A. Sherman regarding confidentiality.	0.20	
09/07/23	JT	110	Begin reviewing Foundation's document production.	1.20	

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				HOURS	AMOUNT
09/08/23	BM	110	Analysis regarding depositions in connection with motions to approve continued use of cash collateral and to appoint examiner.	0.70	
09/08/23	BM	110	Analysis regarding Debtor's document productions.	0.80	
09/08/23	BM	110	Analysis regarding Foundation's document productions.	0.70	
09/08/23	JT	110	Continue review of documents produced in discovery.	3.10	
09/08/23	MS	110	Review document production from the Foundation.	0.30	
09/11/23	JT	110	Continue reviewing discovery materials.	2.30	
09/12/23	BM	110	Analysis of Foundation's governance documents and board minutes.	1.30	
09/12/23	BM	110	Analysis and revisions of objection to motion to appoint examiner.	1.30	
09/12/23	JT	110	Telephone conference with B. Mankovetskiy regarding discovery.	0.30	
09/12/23	GAK	110	Call with B. Mankovetskiy regarding examiner motion.	0.20	
09/12/23	GAK	110	Update examiner objection.	0.70	
09/13/23	BM	110	Analysis of document productions and issues in connection with Foundation's deposition.	1.20	
09/14/23	BM	110	Analysis and revisions of draft settlement term sheet resolving Foundation issues.	1.40	
09/14/23	BM	110	Analysis regarding deposition of Foundation's 30(b)(6) witness.	0.70	

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				HOURS	AMOUNT
09/14/23	BM	110	Analysis regarding objection to motion to appoint examiner.	0.90	
09/14/23	AHS	110	Emails re: examiner motion and continuance; review of latest draft of response.	0.30	
09/14/23	JT	110	Review updated objection to Examiner Motion.	0.40	
09/14/23	JT	110	E-mail to A. Sherman and B. Mankovetskiy regarding depositions.	0.30	
09/14/23	GAK	110	Email to Sills team regarding examiner objection.	0.10	
09/15/23	BM	110	Analysis regarding proposed settlement term sheet regarding Foundation issues.	1.10	
09/15/23	BM	110	Analysis regarding Debtors' discovery productions.	0.80	
09/15/23	BM	110	Correspondence with counsel to the Debtors and bondholders regarding proposed revisions of proposed settlement term sheet.	0.70	
09/15/23	BM	110	Analysis of Toney deposition transcript.	0.80	
09/15/23	JT	110	Attend M. Toney deposition.	5.50	
09/15/23	JT	110	E-mail to A. Sherman and B. Mankovetskiy regarding discovery.	0.30	
09/17/23	BM	110	Analysis regarding bondholders' revisions of proposed settlement term sheet.	0.60	
09/18/23	BM	110	Analysis regarding Debtors' document productions.	0.80	
09/18/23	BM	110	Correspondence with counsel to Debtors and Preston Hollow regarding proposed settlement of Foundation issues.	0.60	

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				HOURS	AMOUNT
09/18/23	BM	110	Analysis and revisions of proposed settlement term sheet regarding Foundation issues.	1.70	
09/18/23	JT	110	Review additional production from Debtors'.	2.70	
09/19/23	BM	110	Analysis regarding Debtors' document productions.	0.90	
09/19/23	BM	110	Analysis regarding proposed settlement with respect to Foundation funds.	1.60	
09/20/23	BM	110	Analysis of issues regarding potential settlement with Debtors and Foundation.	1.40	
09/20/23	BM	110	Revisions of proposed settlement term sheet regarding Foundation issues.	0.70	
09/20/23	BM	110	Analysis regarding Foundations declaratory judgment action.	0.70	
09/20/23	JT	110	Review foundation discovery.	1.30	
09/20/23	JT	110	Review deposition transcripts.	0.80	
09/21/23	BM	110	Call with Debtors' and Foundation's counsel regarding potential settlement.	0.40	
09/21/23	BM	110	Analysis of issues regarding potential settlement with Foundation.	1.30	
09/21/23	BM	110	Analysis regarding Debtors' document productions.	0.70	
09/21/23	BM	110	Analysis regarding Debtors' and Foundations' discovery productions.	1.60	
09/21/23	JT	110	Review Foundation's supplemental document production.	1.40	
09/22/23	BM	110	Call with Debtors' and PH's counsel regarding Foundation issues.	0.50	

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				HOURS	AMOUNT
09/22/23	BM	110	Call with Debtors' counsel regarding Foundation issues.	0.30	
09/22/23	BM	110	Analysis regarding potential settlement with Debtors, Foundation and Preston Hollow.	1.30	
09/22/23	BM	110	Analysis regarding Foundation's attempted amendment of by-laws and potential responses thereto.	1.80	
09/22/23	BM	110	Analysis regarding Foundation's discovery productions.	1.10	
09/22/23	BM	110	Analysis and revisions of letter to Debtors regarding Foundation's conduct.	0.60	
09/22/23	JT	110	Review L. Steigleder deposition transcript.	0.60	
09/24/23	BM	110	Analysis regarding Debtors' letter to Foundation.	0.40	
09/27/23	BM	110	Analysis regarding potential settlement with Debtors, Foundation and Bondholders.	1.60	
09/27/23	BM	110	Analysis regarding review of Foundations restricted and unrestricted funds.	0.70	
09/28/23	BM	110	Analysis and revisions of proposed settlement term sheet regarding Foundation issues.	0.90	
09/28/23	BM	110	Analysis regarding Bondholder Representative's revisions to proposed settlement term sheet and comments thereto.	0.70	
09/29/23	BM	110	Analysis and revisions of proposed settlement term sheet.	0.80	
TASK TOTAL 110				<u>74.40</u>	<u>\$64,283.50</u>

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				HOURS	AMOUNT
114 – RELIEF FROM STAY PROCEEDINGS					
09/22/23	JT	114	E-mail committee regarding Foundation stay violation and related issues.	0.40	
09/22/23	JT	114	Draft correspondence to Debtors' counsel regarding Foundation stay violation.	0.80	
09/22/23	JT	114	Research regarding stay relief issues.	1.20	
09/26/23	BM	114	Analysis of issues regarding staffing agencies and motion to enforce automatic stay.	0.80	
TASK TOTAL 114				3.20	\$2,740.00
116 – TRAVEL (billed at 50%)					
09/12/23	AHS	116	Travel from Newark to Cedar Rapids for hearing. (5.50)	2.75	
09/13/23	AHS	116	Travel from Cedar Rapids to Newark. (5.00)	2.50	
TASK TOTAL 116				5.25	\$5,223.75
TOTAL FEES at Standard Rates				280.25	\$240,772.25
Attorney Fees at Blended Rate of \$675				279.65	\$188,763.75
Paralegal Fees at Standard Rate				0.60	195.00
TOTAL FEES at Blended Rate				280.25	\$188,958.75

TASK CODE SUMMARY

101	Asset Analysis and Recovery	1.80	\$1,575.00
102	Asset Disposition	37.90	\$32,729.50
104	Case Administration	44.20	\$39,841.50

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105	Claims Administration and Objections	23.40	\$18,630.00
107	Fee/Employment Applications	13.20	\$9,840.00
108	Fee/Employment Objections	15.00	\$12,892.50
109	Financing	61.90	\$53,016.50
110	Litigation (Other than Avoidance Action Litigation	74.40	\$64,283.50
114	Relief from Stay Proceedings	3.20	\$2,740.00
116	Travel (billed at 50%)	5.25	\$5,223.75
TOTAL FEES at Standard Rates		280.25	\$240,772.25
Attorney Fees at Blended Rate of \$675		279.65	\$188,763.75
Paralegal Fees at Standard Rate		0.60	195.00
TOTAL FEES at Blended Rate		280.25	\$188,958.75

Andrew H. Sherman	45.45	x	\$995.00	=	\$45,222.75
Boris Mankovetskiy	101.60	x	\$875.00	=	\$88,900.00
Jason Teele	65.70	x	\$850.00	=	\$55,845.00
Matthew Holden	10.50	x	\$695.00	=	\$7,297.50
Michael Savetsky	39.60	x	\$795.00	=	\$31,482.00
Gregory A. Kopacz	15.40	x	\$725.00	=	\$11,165.00
Oleh Matviyishyn	1.40	x	\$475.00	=	\$665.00
Anna L. Irvin	0.60	x	\$325.00	=	\$195.00

DISBURSEMENT DETAIL

09/07/23	222	Court Reporter Transcript Fees (Everest Court Reporting LLC – Certified copy of 9/7/23 Deposition of Charles Richard Bayman of H2C)	\$1,605.10
09/15/23	222	Court Reporter Transcript Fees (Everest Court Reporting LLC – Certified copy of 9/15/23 Deposition of Mark E. Toney)	\$1,895.69
09/11/23	358	Pacer	\$0.20
09/11/23	358	Pacer	\$0.20
09/11/23	358	Pacer	\$3.00
09/11/23	358	Pacer	\$1.80
09/19/23	379	Lexis-Nexis	\$107.38
TOTAL DISBURSEMENTS			\$3,613.37

Creditors' Committee

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INVOICE SUMMARY	
Total Fees	\$188,958.75
Total Disbursements	\$3,613.37
TOTAL THIS INVOICE	\$192,572.12*

*Total includes fees at **Blended Rate**. Per Retention Application, lesser of fees at *Standard Rates* (**\$240,772.25**) and fees at *Blended Rate* of \$675 (**\$188,958.75**)** apply.

**includes paralegal fees at standard rates, if applicable